

Mr. Don Schnell  
Vincent Bach, a Division of Selmer  
500 Industrial Parkway  
Elkhart, IN 46516

Re: Re: 039-14696  
First Significant Permit Modification to  
Part 70 039-7813-00010

Dear Mr. Schnell:

Vincent Bach, a division of Selmer, was issued a Title V permit on January 4, 2001 for the operation of a stationary musical instrument manufacturing source. A letter requesting changes in facility descriptions and some permit conditions was received on July 23, 2001. This modification relates to the discontinuation of noncompliant coating usage at the facility; the replacement of the two (2) surface coating booths with one (1) new booth; and the removal of thirty-nine (39) solvent cold cleaners. The modification stated above involves the relaxation of reporting and record keeping conditions. Pursuant to the provisions of 326 IAC 2-7-12(d)(1) a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

mm

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Tony Pelath  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Vincent Bach, a division of Selmer  
500 Industrial Parkway  
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7813-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: 01-04-2001

First Significant Permit Modification:039-14696	Pages Modified: 3, 4, 5, 6, 29, 30, 31, 44, 45, 46, 47, 48, 54
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: November 12, 2001

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary musical instrument manufacturing source.

Responsible Official:	Don J. Schnell
Source Address:	500 Industrial Parkway, Elkhart, Indiana 46516
Mailing Address:	500 Industrial Parkway, Elkhart, Indiana 46516
Phone Number:	219-295-6730
SIC Code:	3931
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) surface coating booth, identified as EU-03A, for coating brass musical instruments, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stack S3A, capacity: 100 instruments per hour.
- (b) One (1) buffing department, with a total capacity of 100 instruments per hour, consisting of six (6) buffing lines including:
  - (1) Department 1051 (Main Buffing) mush buff, identified as EU-01E, constructed in 1988, controlled by baghouse 11A and exhausting through stack S11A;
  - (2) Department 1051 (Main Buffing) EU-01F, constructed in 1997, controlled by baghouse 9A and exhausting through stack S9A;
  - (3) Department 1051 (Main Buffing) EU-01G, constructed in 1997, controlled by baghouse 9B and exhausting through stack S9B;
  - (4) Department 1051 (Main Buffing) EU-01H, constructed in 1997, controlled by baghouse 9C and exhausting through stack S9C;
  - (5) Department 1051 (North Buffing Room), one (1) buffing room, EU-01I, constructed in 1988, controlled by a cyclone and two (2) baghouses 10A and 10B and exhausting through stacks S10A and S10B; and
  - (6) EU-01J (Department 1059 mouthpiece/ Department 1044 small parts buffing), constructed in 1988, controlled by baghouse 10C and exhausting through stack S10C.

- (c) One (1) polishing department, constructed in 1997, with a total capacity of 100 instruments per hour, consisting of three (3) polishing lines and one (1) mush buff line as follows:
  - (1) Department 1041 (Brass Parts Buffing), one (1) mush buff line, identified as EU-01A, and one (1) polish line, identified as EU-01B, controlled by baghouse 11B and exhausting through stack S11B; and
  - (2) Department 1041 (Brass Parts Buffing), two (2) polish lines, identified as EU-01C and EU-01D, controlled by baghouses 11C and 11D and exhausting through stacks S11C and S11D, respectively.
- (d) One (1) open top vapor degreaser, identified as EU-02A, using trichloroethylene, constructed in 1999, replacing an existing defective degreaser which was constructed in 1959, capacity: 11 instruments or equivalent parts per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. One (1) natural gas-fired boiler, capacity: 6.28 million British thermal units per hour. [326 IAC 6-2]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (e) Activities or categories of activities with individual HAP emissions not previously identified.  
  
Any unit emitting greater than one (1) pound per day but less than five (5) pounds per day of one (1) ton per year of a single HAP.  
  
Brief description: Brazing with alloys containing HAPs (Cadmium). [326 IAC 6-3-2]
- (f) Activities or categories of activities with a combination of HAP emissions not previously identified.

Any unit emitting greater than one (1) pound per day but less than twelve and one half (12.5) pounds per day of two and one half (2.5) ton per year of any combination of HAPs.

Brief description:

Plating touch up on silver horns. Potassium Cyanide and Sodium Cyanide. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).



## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.



- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and the Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Northern Regional Office

Telephone Number: 219-245-4870

Facsimile Number: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that

either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.



- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
  - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline

specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation. An emission unit that is idle and not producing emissions is not considered to be in operation.

**C.7 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## Testing Requirements [326 IAC 2-7-6(1)]

### C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

### C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.14 Pressure Gauge Specifications**

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within ninety (90) days after the date of issuance of this permit.  
  
The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.



- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:

- (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
  - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
  - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these

corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

##### **C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable

time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by

326 IAC 2-7-1(34).

- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) surface coating booth, identified as EU-03A, for coating brass musical instruments, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stack S3A, total capacity: 100 instruments per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of clear coating applied to musical instruments at booth EU-03A shall be limited to 4.3 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the surface coating booth identified as EU-03A shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

### Compliance Determination Requirements

#### D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the surface coating booth, identified as EU-03A, is in operation.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading

of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S3A while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.7 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
- (b) To document compliance with Conditions D.1.5 and D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (b) One (1) buffing department, with a total capacity of 100 instruments per hour, consisting of six (6) buffing lines including:
- (1) Department 1051 (Main Buffing) mush buff, identified as EU-01E, constructed in 1988, controlled by baghouse 11A and exhausting through stack S11A;
  - (2) Department 1051 (Main Buffing) EU-01F, constructed in 1997, controlled by baghouse 9A and exhausting through stack S9A;
  - (3) Department 1051 (Main Buffing) EU-01G, constructed in 1997, controlled by baghouse 9B and exhausting through stack S9B;
  - (4) Department 1051 (Main Buffing) EU-01H, constructed in 1997, controlled by baghouse 9C and exhausting through stack 9C;
  - (5) Department 1051 (North Buffing Room), one (1) buffing room, EU-01I, constructed in 1988, controlled by a cyclone and two (2) baghouses 10A and 10B and exhausting through stacks S10A and S10B; and
  - (6) EU-01J (Department 1059 mouthpiece/ Department 1044 small parts buffing), constructed in 1988, controlled by baghouse 10C and exhausting through stack S10C.
- (c) One (1) polishing department, constructed in 1997, with a total capacity of 100 instruments per hour, consisting of three (3) polishing lines and one (1) mush buff line as follows:
- (1) Department 1041 (Brass Parts Buffing), one (1) mush buff line, identified as EU-01A, and one (1) polish line, identified as EU-01B, controlled by baghouse 11B and exhausting through stack S11B; and
  - (2) Department 1041 (Brass Parts Buffing), two (2) polish lines, identified as EU-01C and EU-01D, controlled by baghouses 11C and 11D and exhausting through stacks S11C and S11D, respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM and PM<sub>10</sub>) [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3 (Process Operations), the source shall comply with the following:

- (a) The PM emission rate from the one (1) mush buff line, identified as EU-01A and the one (1) polish line, identified as EU-01B, both exhausting to baghouse 11B and stack S11B shall not exceed 1.05 pounds per hour, total, when operating at a combined process weight rate of 262 pounds per hour.
- (b) The PM emission rate from the one (1) polish line, identified as EU-01C, and the one (1) polish line, identified as EU-01D, each shall not exceed 0.660 pounds per hour, when operating at a process weight rate of 131 pounds per hour, each.

- (c) The PM emission rate from the one (1) mush buff line, identified as EU-01E, shall not exceed 0.802 pounds per hour, when operating at a process weight rate of 175 pounds per hour.
- (d) The PM emission rate from the one (1) buffing line, identified as EU-01F, one (1) buffing line, identified as EU-01G, and one (1) buffing line, identified as EU-01H, each shall not exceed 0.764 pounds per hour, when operating at a process weight rate of 163 pounds per hour, each.
- (e) The PM emission rate from the one (1) buffing line, identified as EU-01I, and the one (1) buffing line, identified as EU-01J, each shall not exceed 0.551 pounds per hour, when operating at a process weight rate less than 100 pounds per hour, each.

These limitations are based on the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (f) Compliance with these limits will make the source a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. Therefore, the requirements of 326 IAC 2-2 are not applicable.

#### **D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices.

### **Compliance Determination Requirements**

#### **D.2.3 Particulate Matter (PM)**

The baghouses and cyclone for PM control shall be in operation and control emissions from the buffing and polishing at all times that the buffing and polishing are in operation.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.2.4 Visible Emissions Notations**

- (a) Daily visible emission notations of the buffing and polishing stacks (S9A, S9B, S9C, S10A, S10B, S10C, S11A, S11B, S11C and S11D) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses and cyclone used in conjunction with the buffing and polishing operations, at least once weekly when the buffing and polishing is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses and cyclone shall be maintained within the range of 1.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.2.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the buffing and polishing operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### D.2.7 Cyclone Inspections

An inspection shall be performed each calendar quarter of the cyclone controlling the buffing operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### D.2.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

## **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.2.10 Record Keeping Requirements**

- 
- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the buffing and polishing stacks exhaust.
  - (b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
    - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
      - (A) Inlet and outlet differential static pressure; and
      - (B) Cleaning cycle: frequency and differential pressure.
    - (2) Documentation of all response steps implemented, per event.
    - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
    - (4) Quality Assurance/Quality Control (QA/QC) procedures.
    - (5) Operator standard operating procedures (SOP).
    - (6) Manufacturer's specifications or its equivalent.
    - (7) Equipment "troubleshooting" contingency plan.
    - (8) Documentation of the dates vents are redirected.
  - (c) To document compliance with Conditions D.2.6 and D.2.7, the Permittee shall maintain records of the results of the inspections required under Conditions D.2.6 and D.2.7 and the dates the vents are redirected.
  - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (d) One (1) open top vapor degreaser, identified as EU-02A, using trichloroethylene, constructed in 1999, replacing an existing defective degreaser which was constructed in 1959, capacity: 11 instruments or equivalent parts per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-6]

- (a) Pursuant to 326 IAC 8-3-6 (Organic solvent degreasing operations: open top vapor degreaser operation and control requirements), the owner or operator of the one (1) vapor degreaser shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with cover that can be opened and closed easily with out disturbing the vapor zone.
- (2) Equip the degreaser with the following switches:
  - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
  - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
- (3) Equip the degreaser with a permanent conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) Equip the degreaser with one (1) of the following control devices:
  - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
  - (B) A refrigerated chiller.
  - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
  - (D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.

- (E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of the vapor degreaser shall ensure that the following operating requirements are met:
  - (1) Keep the cover closed at all times except when processing workloads through the degreaser.
  - (2) Minimize solvent carry out emissions by:
    - (A) racking articles to allow complete drainage;
    - (B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
    - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until the condensation ceases;
    - (D) tipping out any pools of solvent on the cleaned articles before removal; and
    - (E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
  - (3) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.
  - (4) Prohibit occupation of more than one-half ( $\frac{1}{2}$ ) of the degreaser's open top area with the workload.
  - (5) Prohibit the loading of the degreaser to the point where the vapor level would drop to more than ten (10) centimeters (four (4) inches) when the workload is removed.
  - (6) Prohibit solvent spraying above the vapor level.
  - (7) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.
  - (8) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste by solvent by weight could evaporate.
  - (9) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
  - (10) Prohibit the use of workplace fans near the degreaser opening.
  - (11) Prohibit visually detectable water in the solvent exiting the water separator.

D.3.3 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T] [326 IAC 20-6-1]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP), which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.

- (a) Pursuant to 40 CFR 63.463(a) & (b), the Permittee shall conform to the following design requirements:
  - (1) The cleaning machine shall be designed or operated such that it has a reduced room draft as described in 40 CFR63.463(e)(2)(ii).
  - (2) The cleaning machine shall be employed with a control combination of freeboard refrigeration device, reduced room draft, and freeboard ratio of 1.0 or other equivalent methods of control as determined using the procedure in 40 CFR63.469).
  - (3) Cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minutes (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - (4) Cleaning machine shall be equipped with a device that shuts off sump heat if the sump liquid solvent level drops to the sump heater coils.
  - (5) Cleaning machine shall have a primary condenser.
  - (6) Cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (b) Pursuant to 40 CFR 63.463 (d), the following work and operational practice requirements for the degreasing operation are applicable:
  - (1) Control air disturbances across the cleaning machine opening(s) by creating a reduced room draft as described in 40 CFR63.463(e)(2)(ii).
  - (2) The parts baskets or the parts being cleaned in the cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
  - (3) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
  - (4) Parts shall be oriented so that the solvents drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved by the commissioner.
  - (5) Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.
  - (6) During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.
  - (7) During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.

- (8) When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leak proof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (9) Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the commissioner's satisfaction to achieve the same or better results as those recommended by the manufacturer.
- (10) Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of 40 CFR 63, if requested during an inspection by the commissioner.
- (11) Waste solvents, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.
- (12) Sponges, fabric, wood, and paper products shall not be cleaned.
- (c) Pursuant to 40 CFR 63.463 (e), the Permittee shall comply with the following requirements:
  - (1) The Permittee shall conduct monitoring of each control device used to comply with §63.463 as provided in 40 CFR 63.466, monitoring procedures.
  - (2) Determine during each monitoring period if the control device used to comply with the above standards meets the following requirements:
    - (A) The Permittee shall ensure that the chilled air blanket temperature (in EF), measured at the center of the air blanket of the freeboard refrigeration device is no greater than 30% of the solvent's boiling point.
    - (B) When using a reduced room draft the Permittee shall:
      - (i) ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at anytime as measured using the procedures in 40 CFR 63.466(d).
      - (ii) establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 40 CFR 63.466 (d).
  - (3) An exceedance has occurred if:
    - (A) the requirements of paragraph (c)(2)(B)(ii) of this condition are not met; and
    - (B) the requirements of paragraphs (c)(2)(A) and (c)(2)(B)(i) of this condition have not been met and are not corrected within 15 days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameters must be re-measured immediately upon adjustment or repair and demonstrated to be within the required limits.



- (4) the owner or operator shall report all exceedances and all corrections and adjustments made to avoid an exceedances as specified in 40 CFR 63.468.

**D.3.4 Volatile Organic Compounds (VOC) [326 IAC 2-2]**

Any change or modification to the facilities in this permit that increases the potential to emit VOC to 250 tons per year or more may cause the source to become subject to 326 IAC 2-2, Prevention of Significant Deterioration (PSD) and prior approval is required.

**D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

**Compliance Determination Requirements**

**D.3.6 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)] [40 CFR 63.465]**

The Permittee is not required to test this facility by this permit or by 40 CFR Part 63; 40 CFR 63.465 Test Methods. However, IDEM may require compliance testing in writing at any specific time when necessary to determine if the facility is in compliance.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.3.7 Monitoring Procedures [326 IAC 2-7-6(1)] [40 CFR 63.466]**

Pursuant to 40 CFR 63.466 the Permittee shall comply with the following monitoring procedures:

- (a) The Permittee shall conduct monitoring and record the results on a weekly basis for the control devices, as appropriate, specified in paragraph(s) below:

The Permittee shall use a thermometer or thermocouple to measure the temperature at the center of the air blanket of the freeboard refrigeration device, during the idling mode.

- (b) The Permittee shall conduct monitoring and record the results on a monthly basis for the control devices, as appropriate, specified in paragraphs (c) and (d) below.

- (c) The Permittee shall monitor the hoist speed as described below:

- (1) The Permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes.

- (2) The monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the Permittee may begin monitoring the hoist speed quarterly.

- (3) If the exceedances of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to the monthly until another year of compliance without an exceedances is demonstrated.

- (4) If the Permittee can demonstrate to the commissioner's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.

- (d) The Permittee shall conduct monitoring and record the results, for a reduced room draft, as specified in the following paragraphs:

The Permittee shall conduct an initial monitoring test of the windspeed and of room parameters, quarterly monitoring of wind speed, and weekly monitoring of room parameters as specified below:

- (1) measure the wind speed within 6 inches above the top of the freeboard area of the solvent cleaning machine using the following procedures:
  - (A) determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
  - (B) orient a velometer in the direction of the wind current at each of the four corners of the machine.
  - (C) record the reading for each corner.
  - (D) average the values obtained at each corner and record the average wind speed.
- (2) monitor on a weekly basis the room parameters established during the initial compliance test that are used to achieve the reduced room draft.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.3.8 Record Keeping Requirements**

- (a) The Permittee shall maintain, in written or electronic form, records of the following information specified below, for the life time of the machine,
  - (1) Owners's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
  - (2) The date of installation of the solvent cleaning machine and all of its control devices. If the exact date of the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted.
  - (3) Records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine.
- (b) The Permittee shall maintain, in written or electronic form, records of the following information specified below for a period of 5 years:
  - (1) The results of control device monitoring required under 40 CFR 63.466.
  - (2) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
  - (3) Estimates of annual solvent consumption for each solvent cleaning machine.

#### D.3.9 Reporting Requirements [40 CFR 63.468]

A summary of the information to document compliance with Condition D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (a) An initial notification report for the open top batch vapor degreaser was submitted on September 22, 1999
- (b) An initial statement of compliance for the open top batch vapor degreaser was submitted on November 30, 1999.
- (c) The Permittee shall submit an annual report by February 1 of each year following the one for which the reporting is being made. This report shall include the requirements as follows:
  - (1) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR63.463(d)(10)."
  - (2) An estimate of solvent consumption for each solvent cleaning machine during the reporting period.
- (d) The Permittee shall submit an exceedances report to the commissioner semiannually except when, the commissioner determines, on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedances occurs. Once an exceedances has occurred the Permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under paragraph 40 CFR 63.468 (i) of this section is approved. Exceedances reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The exceedances report shall include the applicable information as given below:
  - (1) Information on the actions taken to comply with 40 CFR 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
  - (2) If an exceedances has occurred, the reason for the exceedances and a description of the actions taken.
  - (3) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.
- (e) Pursuant to 40 CFR 63.463 (i), the Permittee who is required to submit an exceedances report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:

- (1) The source has demonstrated a full year of compliance without an exceedances.
  - (2) The Permittee continues to comply with all relevant record keeping and monitoring requirements specified in Subpart A (General Provisions) and in 40 CFR 63, Subpart T.
  - (3) The commissioner does not object to a reduced frequency of reporting for the affected source as provided in paragraphs (e)(3)(iii) of Subpart A (General Provisions) of 40 CFR 63.
- (f) The Permittee of a solvent cleaning machine requesting an equivalency determination, as described in 40 CFR 63.469 shall submit an equivalency request report to the commissioner and receive an approval prior to startup.

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. One (1) natural gas-fired boiler, capacity: 6.28 million British thermal units per hour.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (c) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) Activities or categories of activities with individual HAP emissions not previously identified.  
  
Any unit emitting greater than one (1) pound per day but less than five (5) pounds per day of one (1) ton per year of a single HAP.  
  
Brief description: Brazing with alloys containing HAPs (Cadmium).
- (f) Activities or categories of activities with a combination of HAP emissions not previously identified.  
  
Any unit emitting greater than one (1) pound per day but less than twelve and one half (12.5) pounds per day of two and one half (2.5) ton per year of any combination of HAPs.  
  
Brief description: Plating touch up on silver horns. Potassium Cyanide and Sodium Cyanide.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1]

Condition 5 from OP 20-01-88-0644, issued on December 4, 1986, which states, "That sulfur dioxide emissions from the boiler shall be limited to 6 pounds per million BTU's of heat input according to 325 IAC 7-1," is not applicable since the boiler has the potential sulfur dioxide emissions of less than 25 tons per year.

#### D.4.2 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to OP 20-01-88-0644, issued on December 4, 1986, particulate matter emissions from the one (1) insignificant boiler with a maximum heat input capacity of 6.28 million British thermal units per hour shall be limited to 0.8 pounds per million British thermal units.

#### D.4.3 Particulate Matter (PM) [326 IAC 6-3-2]

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Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the insignificant manufacturing activities, furnaces for melting metals, grinding and machining, brazing, and plating touch up shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
AIR COMPLIANCE BRANCH**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Vincent Bach, a division of Selmer  
Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516  
Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516  
Part 70 Permit No.: T 039-7813-00010

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Affidavit (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT**  
**COMPLIANCE BRANCH**  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Vincent Bach, a division of Selmer  
Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516  
Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516  
Part 70 Permit No.: T 039-7813-00010

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li><b>C</b> The Permittee must notify the Office of Air Management (OAM), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li><b>C</b> The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Vincent Bach, a division of Selmer  
Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516  
Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516  
Part 70 Permit No.: T 039-7813-00010

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #):

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #):

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #):	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #):	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #):	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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# Indiana Department of Environmental Management Office of Air Management

## Addendum to the Technical Support Document for a Significant Permit Modification

Source Name: Vincent Bach, A Division of Selmer  
Source Location: 500 Industrial Parkway, Elkhart, Indiana 46516  
County: Elkhart  
Construction Permit No.: 039-14696  
SIC Code: 3931  
Permit Reviewer: Madhurima D. Moulik

On September 8, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Vincent Bach, a Division of Selmer, had applied for a significant permit modification, relating to surface coating and solvent cold cleaning operations at the musical instrument manufacturing plant. The notice also stated that OAQ proposed to issue a significant permit modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 25, 2001, KERAMIDA Environmental Inc., on behalf of Vincent Bach, submitted comments on the proposed significant permit modification. The summary of the comments and corresponding responses is as follows:

1. Comment: Sections D.1.2 and D.1.5 contain language referring to “two (2) surface coating booths, identified as EU-03A and EU-03B...”. These sections need to be corrected to refer to “one (1) surface coating booth, identified as EU-03A..”.

Response: The descriptions in Sections D.1.2 and D.1.5 are changed as follows (~~strikeout~~ to show deletions, **bold** to show additions):

### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

The PM from the ~~two (2)~~ surface coating booths, identified as EU-03A ~~and EU-03B~~, shall not exceed the pound per hour emission rate established as E in the following formula:

### D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the ~~two (2)~~ surface coating booths, identified as EU-03A ~~and EU-03B~~, **are** in operation.

2. Comment: Section D.1.3 requires a Preventive Maintenance Plan for “these facilities and all control devices”. KERAMIDA recommends that the last phrase in this section be changed to read “is required for the dry filters”.

Response: Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- 1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);



- 2) Implement the preventive maintenance plan; and,
- 3) Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, compliance monitoring will never be necessary, it does state that a compliance monitoring plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above. However, there are some types of operations that the Office of Air Quality has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance. Therefore, no changes will be made to this condition.

3. Comment: Installation of the new booth is not scheduled to begin until October 22, 2001 with operation commencing on approximately December 14, 2001; during this period, the original two (2) booths will still be in operation and will continue to use the compliant coating until the new booth is in operation. Therefore, KERAMIDA requested that language be inserted into the modified permit that covers the interim period.

Response: Office of Air Quality has determined that the old permit shall be in effect till the original two (2) booths are replaced by the new booth. The new permit (including the Significant Permit Modification No. 039-14696) will go into effect when the new booth commences operation.

4. Comment: KERAMIDA requested that language be put in the modified permit to denote sections that were deleted from the original Part 70 Operating Permit.

Response: The detailed explanation of the sections that were deleted from the original Part 70 permit in the modified permit has been included in the Technical Support Document (TSD) for the Significant Permit Modification. Therefore, these explanations will not be repeated in the modified permit.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Vincent Bach, A Division of Selmer</b>
<b>Source Location:</b>	<b>500 Industrial Parkway</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3931</b>
<b>Operation Permit No.:</b>	<b>T 039-7813-00010</b>
<b>Operation Permit Issuance Date:</b>	<b>01-04-2001</b>
<b>Permit Modification No.:</b>	<b>039-14696</b>
<b>Permit Reviewer:</b>	<b>Madhurima D. Moulik</b>

The Office of Air Quality (OAQ) has reviewed a modification application from Vincent Bach, a Division of Selmer, relating to surface coating and solvent cold cleaning operations at the musical instrument manufacturing plant.

#### **Explanation of Modification**

This modification has three parts. One part deals with all paints used being applicable to rule 326 IAC 8-2-9 (Previously, one paint booth, EU-03B, was limited out of rule 8-2-9). One part deals with one paint booth being used instead of two booths. None of the paint process equipment is being replaced. There will not be an increase in production. Thus, PTE will not be increased. The last part deals with the removal of thirty-nine (39) solvent cold cleaners.

#### **Justification for the Modification**

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. The modification stated above involves the relaxation of reporting and record keeping conditions. As such, this modification is being performed pursuant to 326 IAC 2-7-12(d)(1) which states: "Every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms and conditions shall be considered significant".

#### **Existing Approvals**

The source was issued a Part 70 Operating Permit 039-7813-00010 on January 4, 2001.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 23, 2001.

### Proposed Changes to the Part 70 Operating Permit

The following changes are the Significant Permit Modification for this source (~~strikeout~~ added to show the deletions and **bold** to show the additions):

(1) The facility description in Section A.2 is changed:

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]**

This stationary source consists of the following emission units and pollution control devices:

- (a) ~~Two (2)~~ **One (1)** surface coating booths, identified as EU-03A ~~and EU-03B~~, for coating brass musical instruments, ~~constructed prior to 1970~~, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stacks S3A, ~~and S3B~~, total capacity: 100 instruments per hour.
- (b) One (1) buffing department, with a total capacity of 100 instruments per hour, consisting of six (6) buffing lines including:
  - (1) Department 1051 (Main Buffing) mush buff, identified as EU-01E, constructed in 1988, controlled by baghouse 11A and exhausting through stack S11A;
  - (2) Department 1051 (Main Buffing) EU-01F, constructed in 1997, controlled by baghouse 9A and exhausting through stack S9A;
  - (3) Department 1051 (Main Buffing) EU-01G, constructed in 1997, controlled by baghouse 9B and exhausting through stack S9B;
  - (4) Department 1051 (Main Buffing) EU-01H, constructed in 1997, controlled by baghouse 9C and exhausting through stack 9C;
  - (5) Department 1051 (North Buffing Room), one (1) buffing room, EU-01I, constructed in 1988, controlled by a cyclone and two (2) baghouses 10A and 10B and exhausting through stacks S10A and S10B; and
  - (6) EU-01J (Department 1059 mouthpiece/ Department 1044 small parts buffing), constructed in 1988, controlled by baghouse 10C and exhausting through stack S10C.
- (c) One (1) polishing department, constructed in 1997, with a total capacity of 100 instruments per hour, consisting of three (3) polishing lines and one (1) mush buff line as follows:
  - (1) Department 1041 (Brass Parts Buffing), one (1) mush buff line, identified as EU-01A, and one (1) polish line, identified as EU-01B, controlled by baghouse 11B and exhausting through stack S11B; and
  - (2) Department 1041 (Brass Parts Buffing), two (2) polish lines, identified as EU-01C and EU-01D, controlled by baghouses 11C and 11D and exhausting through stacks S11C and S11D, respectively.

- (d) One (1) open top vapor degreaser, identified as EU-02A, using trichloroethylene, constructed in 1999, replacing an existing defective degreaser which was constructed in 1959, capacity: 11 instruments or equivalent parts per hour.
- ~~(e) Thirty-nine (39) solvent cold cleaners, identified as EU-02B, all constructed in 1999, replacing existing defective solvent cold cleaners which were unpermitted, twenty-nine (29) with a capacity of 15 gallons, six (6) with a capacity of 6.5 gallons, and four (4) with a capacity of 19 gallons.~~

(2) The facility description in Section D.1 is changed:

#### SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) ~~Two (2)~~ **One (1)** surface coating booths, identified as EU-03A ~~and EU-03B~~, for coating brass musical instruments, ~~constructed prior to 1970~~, equipped with electrostatic air atomized spray guns and dry filters for overspray control, exhausting to stacks S3A ~~and S3B~~, ~~total~~ capacity: 100 instruments per hour.

(3) The conditions in Section D.1.1(b) are deleted, as the source no longer uses noncompliant coating.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

##### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of clear coating applied to musical instruments at booth EU-03A shall be limited to 4.3 pounds of VOCs per gallon of coating less water.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- ~~(b) The one (1) surface coating booth, identified as EU-03B, shall use less than fifteen (15) pounds of VOC, including coatings, dilution solvents, and cleaning solvents, per day. This usage limit is required to limit the potential to emit VOC to less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable to that facility.~~

(4) The conditions in D.1.5 (VOC Emissions) are deleted as compliance with Section D.1.1(b) is no longer required.

#### Compliance Determination Requirements

##### D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

##### ~~D.1.5 VOC Emissions~~

~~Compliance with Condition D.1.1(b) shall be demonstrated within 30 days of the end of each day~~

~~based on the total volatile organic compound usage at the one (1) surface coating booth (EU-03B) for that day.~~

- (5) The conditions in Section D.1.7 are changed as the source will replace two (2) booths and (2) stacks with one (1) booth and one (1) stack.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S3A and S3B) while ~~one (1) or more of the booths are~~ **is** in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (6) The conditions in Section D.1.8(a)(3), D.1.8(a)(4), and D.1.8(a)(5) are deleted, as the source no longer uses noncompliant coating. References to D.1.6 and D.1.7 in D.1.8(b) are modified as these are renumbered (as listed later).

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (62) below. Records maintained for (1) through (62) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) ~~The cleanup solvent usage for each day at EU-03B, only;~~
- (4) ~~The total VOC usage for each day at EU-03B, only; and~~
- (5) ~~The weight of VOCs emitted for each day at EU-03B, only.~~

- (b) To document compliance with Conditions D.1.65 and D.1.76, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (7) The conditions in Section D.1.9 are deleted, as the source is no longer required to comply with Condition D.1.1(b).

~~D.1.9 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.1(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- (8) The subsections D.1.6 through D.1.8 are renumbered.

D.1.65 Particulate Matter (PM)

D.1.76 Monitoring

D.1.87 Record Keeping Requirements

(9) Section D.4 is deleted because the thirty-nine (39) solvent cold cleaners are no longer in operation.

#### SECTION D.4 FACILITY OPERATION CONDITIONS

##### Facility Description [326 IAC 2-7-5(15)]:

- (e) ~~Thirty-nine (39) solvent cold cleaners, identified as EU-02B, all constructed in 1999, replacing existing defective solvent cold cleaners which were unpermitted, twenty-nine (29) with a capacity of 15 gallons, six (6) with a capacity of 6.5 gallons, and four (4) with a capacity of 19 gallons.~~

~~(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)~~

##### Emission Limitations and Standards [326 IAC 2-7-5(1)]

##### D.4.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

~~The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart T.~~

##### D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) ~~Pursuant to 326 IAC 8-3-5 (Organic solvent degreasing operations: cold cleaner degreaser operation and control), the owner or operator of the thirty-nine (39) cold cleaners shall ensure that the following control equipment requirements are met:~~
- ~~(1) Equip the degreaser with cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - ~~(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38C) (one hundred degrees Fahrenheit (100F));~~
    - ~~(B) the solvent is agitated; or~~
    - ~~(C) the solvent is heated.~~~~
  - ~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38C) (one hundred degrees Fahrenheit (100F)); then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~
  - ~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
  - ~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~
  - ~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at~~

~~thirty-eight degrees Celsius (38C) (one hundred degrees Fahrenheit (100F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9C) (one hundred and twenty degrees Fahrenheit (120F));~~

~~(A) — A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater;~~

~~(B) — A water cover when solvent used is insoluble in, and heavier than, water;~~

~~(C) — Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

~~(b) — The owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:~~

~~(1) — Close the cover whenever articles are not being handled in the degreaser.~~

~~(2) — Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

~~(3) — Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

~~D.4.3 — Halogenated Solvent Cleaning NESHAP [326 IAC 20-6-1][40 CFR Part 63, Subpart T]~~

~~These facilities are subject to 40 CFR Part 63, Subpart T, which is incorporated by reference as 326 IAC 20-6-1. A copy of the rule is attached.~~

~~(a) — The Permittee shall employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater.~~

~~(b) — The following work and operational practice requirements for the thirty-nine (39) solvent cold cleaners are also applicable:~~

~~(1) — All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.~~

~~(2) — If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.~~

~~(3) — The Permittee shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.~~

~~(4) — The Permittee shall ensure that the solvent line does not exceed the fill line.~~

~~(5) — Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of Condition D.1.2(b)(1).~~

~~(6) — When an air- or pump-agitated solvent bath is used, the Permittee shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.~~

(7) ~~The Permittee shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.~~

(c) ~~Sponges, fabric, wood, and paper products shall not be cleaned in the degreasing operation.~~

~~D.4.4 Volatile Organic Compounds (VOC) [326 IAC 2-2]~~

~~Any change or modification to the facilities in this permit that increases the potential to emit VOC to 250 tons per year or more may cause the source to become subject to 326 IAC 2-2, Prevention of Significant Deterioration (PSD) and prior approval is required.~~

~~D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B -- Preventive Maintenance Plan, of this permit, is required for these facilities.~~

~~Compliance Determination Requirements~~

~~D.4.6 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]~~

~~The Permittee is not required to test this facility by this permit or by 40 CFR 63.465, Test Methods. However, IDEM may require compliance testing in writing at any specific time when necessary to determine if the facilities are in compliance.~~

(10) The Part 70 Quarterly report is deleted as the noncompliant coating is no longer used.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
AIR COMPLIANCE BRANCH**

**Part 70 Quarterly Report**

Source Name: Vincent Bach, a division of Selmer  
Source Address: 500 Industrial Parkway, Elkhart, Indiana 46516  
Mailing Address: 500 Industrial Parkway, Elkhart, Indiana 46516  
Part 70 Permit No.: T-039-7813-00010  
Facility: One (1) surface coating booth (EU-03B)  
Parameter: VOC usage  
Limit: Less than fifteen (15) pounds per day

**Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

Day	VOC Usage (lb/day)	Day	VOC Usage (lb/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	



8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

~~9~~No deviation occurred in this month.

~~9~~Deviation/s occurred in this month:

~~Deviation has been reported on:~~

~~Submitted by:~~

~~Title/Position:~~

~~Signature:~~

~~Date:~~

~~Phone:~~

~~Attach a signed certification to complete this report.~~

(11) The sections and subsections in D.5 are renumbered.

#### SECTION D.54

#### FACILITY OPERATION CONDITIONS

D.54.1

Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1]

D.54.2

Particulate Matter (PM) [326 IAC 6-2]

D.54.3

Particulate Matter (PM) [326 IAC 6-3-2]

(12) The Table of Contents is modified to remove Section D.4 and the Quarterly Report. The Section D.5 is renumbered as D.4. The subsection D.1.5 and D.1.9 are removed, and the D.1 section title is modified.

D.1FACILITY OPERATION CONDITIONS: ~~Two (2)~~ One (1) surface coating booths..... 28

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

~~D.1.5 VOC Emissions~~

D.1.65 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.76 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.87 Record Keeping Requirements

~~D.1.9 Reporting Requirements~~

~~D.4 FACILITY OPERATION CONDITIONS: Thirty-nine (39) solvent cold cleaners.....43~~

~~Emission Limitations and Standards [326 IAC 2-7-5(1)]~~

~~D.4.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]~~

~~D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]~~

~~D.4.3 Halogenated Solvent Cleaning NESHAP [326 IAC 20-6-1][40 CFR Part 63, Subpart T]~~

~~D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-6]~~

~~D.4.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~Compliance Determination Requirements~~

~~D.4.6 Testing Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]~~

**D.54 FACILITY OPERATION CONDITIONS: Insignificant Activities.....4644**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

**D.54.1** Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1]

**D.54.2** Particulate Matter (PM) [326 IAC 6-2]

**D.54.3** Particulate Matter (PM) [326 IAC 6-3-2]

Certification

Emergency Occurrence Report

Quarterly Deviation and Compliance Monitoring Report

~~Quarterly Report~~

**Conclusion**

This permit modification shall be subject to the conditions of the attached Part 70 Significant Permit Modification No. T 039-14696-00010.